

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

ROOT, INC., et al.,

Plaintiffs,

vs.

BRINSON CALEB SILVER, et al.,

Defendants.

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**Case No. 2:23-cv-512
Judge Sarah D. Morrison
Magistrate Judge Elizabeth A.
Preston Deavers**

**RECEIVER’S SEVENTH INTERIM REPORT, RECEIVERSHIP PLAN
AND APPLICATION FOR FEES AND EXPENSES OF RECEIVER AND
COUNSEL TO RECEIVER COVERING THE PERIOD
JANUARY 1, 2024 THROUGH MARCH 15, 2024**

In accordance with the requirements of this Court’s *Order*, filed May 12, 2023 (ECF 99), *Order Appointing Receiver*, filed May 17, 2023 (ECF 101), and *Order Amending Order Appointing Receiver*, filed June 7, 2023 (ECF 120) (hereinafter collectively “Receiver Order”), Jerry E. Peer, Jr. (“Receiver”), has taken possession and/or control of all monetary and real property assets of Mr. Brinson Caleb Silver, Collateral Damage, LLC and Eclipse Home Design, LLC (hereinafter collectively “Defendants”) known to Receiver, unless otherwise indicated herein. Pursuant to the Receiver Order and 28 U.S.C. §§ 754, 959 and 1692, Rule 66 of the Federal Rules of Civil Procedure, Receiver has completed this Seventh Interim Report and Receivership Plan and accompanying schedules (“Seventh Report”), which covers the period from January 1, 2024 through and including March 15, 2024 (the “Seventh Interim Period”).

I. INTRODUCTION

By way of the Receiver Order, Receiver was appointed to assume complete control and oversight of all monetary and real property assets of Defendants. Since the filing of the Sixth Report, Receiver has continued his efforts to liquidate the monetary and real property assets of Defendants, which have been identified by Receiver. At this time, Receiver is unaware of any

assets of Defendants that are not in Receiver's possession or under his control, with the exception of a bank account located in Jakarta, Indonesia. During the Seventh Interim Period, Receiver collected policy premium refunds from Citizens Insurance in the amount of \$13,036.00. Receiver and his counsel have focused primarily on liquidating the known assets of the Defendants and negotiating with creditors holding secured claims in those assets.

A. 19803 Vista Del Otero, Ramona, California 92065 ("Ramona").

The sale of the Ramona property has closed. The net proceeds of the sale to the receivership estate was \$77,578.95.

B. 9125 North Bayshore Dr., Miami Shores, Florida 33138 ("Bayshore").

The sale of the Bayshore property has closed. The net proceeds of the sale to the receivership estate was \$319,891.85.

C. 2543 Walnut Ave., Venice, California 90291 ("Walnut").

During the Seventh Interim Period, this property, located in Venice, California, was offered for sale by and through an auction listing pursuant to the terms and conditions set forth in the *Motion of Receiver, Jerry E. Peer, Jr., to Employ Gryphon Asset Advisors, LLC as Auctioneer and to Offer Certain Real Property for Public Sale* (ECF 218). The Auction ended on March 16, 2024 with a high bid of \$2,650,800. However, Receiver has now received notice from the highest bidder, Kishnan Patel, that he and his realtor did not fully understand the terms of sale and has since withdrawn his offer to purchase the Walnut property. Receiver will be sending Mr. Patel a demand that he purchase the Property or accept liability for the difference in the ultimate purchase price and Mr. Patel's highest bid plus all costs incurred as a result of the auction. Receiver is also communicating with the next highest bidders to determine if any are still interested in purchasing the Walnut property.

D. 2018 Range Rover and 2017 Mercedes GLE350.

As mentioned in the Sixth Report, Receiver has taken possession of a 2019 Range Rover owned and driven by Mr. Silver. Further investigation has revealed that the title to this Range Rover is encumbered by a loan through Ally bank, the delinquent payoff amount of which exceeds the value of the vehicle. As such, Receiver has determined to abandon it to Ally bank. Receiver has filed a motion to abandon the Range Rover (ECF 199), which this Court has granted in a notational order (ECF 210). Receiver will coordinate with the lender for its orderly disposition.

Additionally, this Court has entered an Order authorizing the sale of the 2018 Mercedes GLE350, which is owned by Mr. Silver and was driven by Ms. Laurie Mannette. The agreed upon purchase price for the Mercedes is \$14,200.00. Receiver is currently in the process of obtaining the requisite documents from the buyer and/or California Department of Motor Vehicles in order to transfer ownership of the Mercedes.

E. Other Assets.

As mentioned above, at this time, the only known asset not currently in the possession or control of Receiver is the bank account located in Jakarta, Indonesia. Mr. Silver has represented that the funds in these accounts have been exhausted, however, Receiver believes there may be significant funds deposited into these accounts and has requested that Defendants provide the information necessary to take control of the balance of that account, or to confirm that these accounts have indeed been exhausted. In addition, Receiver has recently taken possession of Mr. Silver's laptop computer and mobile phone. Receiver has engaged an IT professional to create an image of each device and review the information to assist with the collection of assets and/or information useful to Receiver.

II. RECEIVERSHIP PLAN

This Seventh Report will set forth (1) Receiver's intentions moving forward with regard to both identifying and taking control of assets as well as liquidating assets of value; (2) a statement of assets in Receiver's possession or under his control; (3) anticipated transactional costs to be incurred; (4) anticipated duration of the administration of this estate; (5) engagement of professionals to carry out Receiver's responsibilities; and (6) any litigation or administrative proceedings that are underway or anticipated.

1. Receiver's Goal/Expectations For Administration.

During the Seventh Interim Period, Receiver and his counsel have devoted efforts to liquidating the assets in Receiver's possession or under his control – notably the real estate owned by Eclipse Home Design, LLC. As mentioned above, Receiver has completed the sale of the Ramona and Bayshore properties. Receiver will now focus his attention to resolving the dispute with Mr. Patel and/or identifying new buyers for the Walnut property.

2. Statement of Assets.

At this time, Receiver has not identified any new assets of the estate that have not been previously reported to this Court and the parties. As of March 15, 2024, Receiver currently has \$659,446.27 on deposit. A copy of Receiver's account register reflecting that amount, as well as the January 2024 and February 2024 Huntington National Bank statements, are attached hereto as **"Exhibit A."**

3. Anticipated Transactional Costs and Administrative Expenses.

It is difficult for Receiver to project the anticipated transactional and administrative costs of this estate. While certain expenses are customary and expected, such as administrative fees, utilities, insurance, and other related operating expenses, costs are highly variable and may fluctuate greatly. Receiver expects to incur certain fees, commissions, and expenses associated

with the liquidation of the assets and further administration of the estate. The anticipated costs will also depend greatly on success in taking control of the real estate and liquidating the assets in a cost-efficient manner. Receiver further requests an allowance of \$2,500 per month for related ongoing administrative expenses.

4. Duration of this Receivership.

Based upon this plan, it is estimated that the duration of this receivership estate is three (3) to (6) months, depending on the sale of the Walnut property and what Receiver learns regarding the bank accounts mentioned above.

5. Engagement of Professionals.

Receiver previously engaged property managers in both Florida and California to assist with securing and maintaining the respective properties until sold. Due to the sale of the properties, Receiver has terminated those services while having Receiver's California realtor attend to any needs related to the Walnut property. In addition, previously engaged counsel in Florida to address the foreclosure action previously filed against the Bayshore property. With that property being sold, Receiver will terminate the services of Dickinson Wright.

6. Litigation and Administrative Proceedings.

Receiver is not aware of any new litigation or administrative proceedings not previously reported to this Court.

III. CLAIMS

Receiver has identified various creditors/claimants of Defendants. Receiver has provided notice of the receivership to all known creditors/claimants of Defendants for which Receiver has valid addresses. As claims are received, a creditor matrix will be provided with subsequent interim reports, identifying the claimant and amount of each claim. Receiver notes for the Court no independent analysis or review of the validity or allowance of such claims will be undertaken by

Receiver until assets of the receivership estates are sold, at which time any claims will be reviewed and a recommendation as to the treatment of those claims will be submitted by Receiver.

IV. FEES AND EXPENSES

1. Receiver Fees and Expenses.

As required by the Receiver Order, Receiver is making application to the Court for interim allowance of compensation and reimbursement of out-of-pocket expenses. Please note that while Mr. Jerry E. Peer, Jr. was appointed as Receiver, due to the volume of work necessary, both Mr. Gregory S. Peterson and Mr. Istvan Gajary have performed certain services and billed that time at the Receiver rate of \$150 per hour rather than the counsel rate of \$250 per hour to assist with controlling the costs of administration. A detailed summary of activity for Receiver is attached hereto as “**Exhibit B**”. Receiver requests allowance and payment of interim compensation and expenses in the amount of \$6,075.00 to compensate Receiver for the hours expended and expenses incurred during the Seventh Interim Period.

2. Peterson Connors LLP Fees and Expenses.

Pursuant to the Receiver Order, Receiver employed the services of Mr. Peer, Mr. Peterson, and Mr. Gajary of Peterson Connors LLP (collectively “PetersonConnors”) as its legal counsel. Receiver requests interim allowance and payment of compensation to PetersonConnors in the amount of \$31,575.00 for services rendered to Receiver and \$41.75 for expenses incurred during the Seventh Interim Period. Attached hereto as “**Exhibit C**” is the itemization setting forth the breakdown of time expended and costs advanced by PetersonConnors during the Seventh Interim Period.

3. Dickinson Wright PLLC Fees and Expenses

Pursuant to the Receiver Order, Receiver employed the services of Dickinson Wright PLLC (“DW”) as its legal counsel in relation to the litigation pending in Florida. Receiver

requests interim allowance and payment of compensation to DW in the amount of \$15,039.50 for services rendered to Receiver during the Sixth and Seventh Interim Periods.¹ DW Invoices are attached hereto as “**Exhibit D.**”

V. CONCLUSION

Receiver respectfully submits this Seventh Report and further respectfully requests that this Seventh Report and Receiver’s Seventh Interim Application for Allowance and Payment of Fees and Reimbursement of Expenses be approved.

Respectfully submitted,

PETERSON CONNERS LLP

/s/ Jerry E. Peer, Jr.
Gregory S. Peterson (0061915)
Jerry E. Peer, Jr. (0075128)
Istvan Gajary (0089084)
545 Metro Place South, Suite 435
Dublin, Ohio 43017
Telephone: (614) 365-7000
Facsimile: (614) 220-0197
E-mail: gpeterson@petersonconners.com
jpeer@petersonconners.com
igajary@petersonconners.com
Counsel for Receiver, Jerry E. Peer, Jr.

¹ Receiver is attaching DW invoices for time incurred from December 2023 through February 2024 due to a previous, and already paid, DW invoice being inadvertently attached to the Sixth Report.

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was filed electronically on this March 25, 2024 with the Clerk of Court using the CM/ECF system. Service will be made through the Court's CM/ECF system on all parties and attorneys so registered, and all parties may access this filing through the Court's system.

A copy was also sent by regular U.S.P.S. mail to the following:

Brinson Silver
Butler County Jail
Inmate No. 303850
705 Hanover Street
Hamilton, Ohio 45011

Collateral Damage, Llc
C/O Brinson Silver
Butler County Jail
Inmate No. 303850
705 Hanover Street
Hamilton, Ohio 45011

Eclipse Home Design, Llc
C/O Brinson Silver
Butler County Jail
Inmate No. 303850
705 Hanover Street
Hamilton, Ohio 45011

Paige McDaniel
5576 Alexanders Lake Rd.
Stockbridge, Georgia 30281

/s/ Jerry E. Peer, Jr.
Jerry E. Peer, Jr. (0075128)

Huntington National Bank

Peterson
Conners LLP
ATTORNEYS AND
COUNSELORS AT LAW

Type	Date	Description of transaction	Cleared Y/N	Debit (-)	Credit (+)	Balance
wire	5/23/23	13105 Biscayne closing proceeds	Y		\$570,811.34	\$570,811.34
	5/31/23	Interest	Y		\$0.93	\$570,812.27
fee	6/15/23	Incoming Wire Fee	Y	\$18.00		\$570,794.27
fee	6/15/23	monthly fee, waived	Y	\$40.00	\$40.00	\$570,794.27
	6/30/23	Interest	Y		\$14.08	\$570,808.35
1001	7/11/23	Peterson Conners LLP	Y	\$77,574.02		\$493,234.33
1002	7/20/23	Kristin Hess, AC reimb.	Y	\$2,788.00		\$490,446.33
dep	7/24/23	Shellpoint funds	Y		\$16,513.89	\$506,960.22
1003	7/27/23	Calif. Auto. Ins. Co., 2543 Walnut Ave prem.	Y	\$1,260.15		\$505,700.07
	7/31/23	Interest	Y		\$13.28	\$505,713.35
1004	8/3/23	*void check*	-	\$0.00	\$0.00	\$505,713.35
1005	8/3/23	Daniel's Landscaping, 19803 Vista Del Otero	Y	\$2,250.00		\$503,463.35
1006	8/15/23	Peterson Conners LLP	Y	\$67,427.31		\$436,036.04
dep	8/29/23	Wave Runner sale proceeds	Y		\$10,000.00	\$446,036.04
	8/31/23	interest	Y		\$11.95	\$446,047.99
wire	9/20/23	Gryphon USA, Ltd. Ramona marketing advance	Y	\$12,126.00		\$433,921.99
	9/29/23	interest	Y		\$10.89	\$433,932.88
1007	10/3/23	Peterson Conners LLP	Y	\$28,731.22		\$405,201.66
1008	10/3/23	Hunt Ortman Palffy Nieves Inv. 102103	Y	\$901.87		\$404,299.79
1009	10/3/23	Dickinson Wright PLLC Inv. 1846072	Y	\$17,419.31		\$386,880.48
fees	10/16/23	wire and service fees <i>partially waived</i>	Y	\$90.00	\$40.00	\$386,830.48
1010	10/17/2023	Daniel's Landscaping, 19803 Vista Del Otero	Y	\$1,175.00		\$385,655.48
dep	10/27/23	ICON Aircraft, plane dock sale	Y		\$13,000.00	\$398,655.48
1011	10/31/23	Peterson Conners LLP	Y	\$14,915.61		\$383,739.87
	10/31/23	interest	Y		\$10.01	\$383,749.88
1012	11/2/23	Liquidation Partners, 19803 Vista Del Otero	Y	\$1,700.00		\$382,049.88
1013	11/14/23	Jimmy's Pool Service, Inv 16, 2543 Walnut	Y	\$500.00		\$381,549.88
1014	11/14/23	Daniel's Landscaping, 19803 Vista Del Otero	Y	\$1,200.00		\$380,349.88
1015	11/16/23	CBG, Inv. 2430 1 of 2	Y	\$322.48		\$380,027.40
1016	11/27/23	CBG, Inv. 2430 2 of 2	Y	\$361.48		\$379,665.92

EXHIBIT A

THE HUNTINGTON NATIONAL BANK
PO BOX 1558 EA1W37
COLUMBUS OH 43216-1558



PETERSON CONNERS LLP
545 METRO PL S
DUBLIN OH 43017-5316

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1-800-480-2001

www.huntington.com/
businessresources

Huntington Unlimited Plus Checking

Account: -----4754

Statement Activity From: 01/01/24 to 01/31/24		Beginning Balance	\$457,265.24
		Credits (+)	11,918.52
		Regular Deposits	11,909.00
		Interest Earned	9.52
Days in Statement Period	31	Debits (-)	99,293.93
Average Ledger Balance*	375,362.85	Regular Checks Paid	67,293.93
Average Collected Balance*	374,978.69	Wire Transfer Debits	32,000.00
		Total Service Charges (-)	18.00
		Ending Balance	\$369,871.83

* The above balances correspond to the
service charge cycle for this account.

Average Percentage Yield Earned this period 0.029%
Interest paid last year \$81.51

Deposits (+)

Account:-----4754

Date	Amount	Serial #	Type	Date	Amount	Serial #	Type
01/31	11,909.00	179872482	Brch/ATM				

Other Credits (+)

Account:-----4754

Date	Amount	Description
01/31	9.52	INTEREST PAYMENT


Checks (-)

Account:-----4754

Date	Amount	Check #	Date	Amount	Check #
01/02	50,858.14	1017	01/29	15,140.50	1019
01/17	1,295.29	1018			

(*) Indicates the prior sequentially numbered check(s) may have 1) been voided by you 2) not yet been presented 3) appeared on a previous statement or 4) been included in a list of checks.

Investments are offered through the Huntington Investment Company, Registered Investment Advisor, member FINRA/SIPC, a wholly-owned subsidiary of Huntington Bancshares Inc.

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**Other Debits (-)****Account:-----4754**

Date	Amount	Description
01/02	32,000.00	OUTGOING FEDWIRE TRANSFER - MANUAL

Service Charge Detail**Account:-----4754**

Date	Service Charge (-)	Waives and Discounts (+)	Description
01/16	18.00		WIRE TRANSFER FEES (INCOMING)
01/16	40.00		MONTHLY SERVICE FEE
01/16		40.00	TOTAL RELATIONSHIP SERVICE FEE WAIVE

Service Charge Summary**Account:-----4754**

Previous Month Service Charges (-)	\$58.00
Credits - Previous Month Charges (+)	40.00
Net Service Charges	\$18.00
Total Service Charges (-)	\$18.00

Balance Activity**Account:-----4754**

Date	Balance	Date	Balance	Date	Balance
12/31	457,265.24	01/16	374,389.10	01/29	357,953.31
01/02	374,407.10	01/17	373,093.81	01/31	369,871.83

In the Event of Errors or Questions Concerning Electronic Fund Transfers (electronic deposits, withdrawals, transfers, payments, or purchases), please call either 1-614-480-2001 or call toll free 1-800-480-2001, or write to The Huntington National Bank Research - EA4W61, P.O. Box 1558, Columbus, Ohio 43216 as soon as you can, if you think your statement or receipt is wrong or if you need more information about an electronic fund transfer on the statement or receipt. We must hear from you no later than 60 days after we sent you the FIRST statement on which the error or problem appeared.

1. Tell us your name, your business's name (if appropriate) and the Huntington account number (if any).
2. Describe the error or the transaction you are unsure about, and explain as clearly as you can why you believe there is an error or why you need more information.
3. Tell us the dollar amount of the suspected error. We will investigate your complaint or question and will correct any error promptly.

Verification of Electronic Deposits If you authorized someone to make regular electronic fund transfers of money to your account at least once every sixty days, you can find out whether or not the deposit has been received by us, call either 1-614-480-2001 or call toll free 1-800-480-2001.

Balancing Your Statement - For your convenience, a balancing page is available on our web site <https://www.huntington.com/pdf/balancing.pdf> and also available on Huntington Business Online.

THE HUNTINGTON NATIONAL BANK
PO BOX 1558 EA1W37
COLUMBUS OH 43216-1558



PETERSON CONNERS LLP
545 METRO PL S
DUBLIN OH 43017-5316

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Huntington office or
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1-800-480-2001

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businessresources

Huntington Unlimited Plus Checking

Account: -----4754

Statement Activity From:
02/01/24 to 02/29/24

Days in Statement Period 29

Average Ledger Balance* 348,164.56
Average Collected Balance* 347,598.45

* The above balances correspond to the
service charge cycle for this account.

Beginning Balance	\$369,871.83
Credits (+)	11,247.15
Regular Deposits	1,127.00
Wire Transfer Credits	10,111.88
Interest Earned	8.27
Debits (-)	40,581.29
Regular Checks Paid	28,455.29
Wire Transfer Debits	12,126.00
Total Service Charges (-)	50.00
Ending Balance	\$340,487.69

Average Percentage Yield Earned this period 0.029%
Interest paid last year \$81.51

Deposits (+)

Account:-----4754

Date	Amount	Serial #	Type	Date	Amount	Serial #	Type
02/01	1,127.00	179872147	Brch/ATM				

Other Credits (+)

Account:-----4754

Date	Amount	Description
02/15	10,111.88	INCOMING FEDWIRE TRANSFER
02/29	8.27	INTEREST PAYMENT


Checks (-)

Account:-----4754

Date	Amount	Check #	Date	Amount	Check #
02/12	368.95	1020	02/08	27,383.46	1023
02/12	375.00	1022*	02/20	327.88	1025*

(*) Indicates the prior sequentially numbered check(s) may have 1) been voided by you 2) not yet been presented 3) appeared on a previous statement or 4) been included in a list of checks.

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**Other Debits (-)****Account:-----4754**

Date	Amount	Description
02/14	12,126.00	OUTGOING FEDWIRE TRANSFER - MANUAL

Service Charge Detail**Account:-----4754**

Date	Service Charge (-)	Waives and Discounts (+)	Description
02/15	50.00		WIRE TRANSFER FEES (OUTGOING)
02/15	40.00		MONTHLY SERVICE FEE
02/15		40.00	TOTAL RELATIONSHIP SERVICE FEE WAIVE

Service Charge Summary**Account:-----4754**

Previous Month Service Charges (-)	\$90.00
Credits - Previous Month Charges (+)	40.00
Net Service Charges	\$50.00
Total Service Charges (-)	\$50.00

Balance Activity**Account:-----4754**

Date	Balance	Date	Balance	Date	Balance
01/31	369,871.83	02/12	342,871.42	02/20	340,479.42
02/01	370,998.83	02/14	330,745.42	02/29	340,487.69
02/08	343,615.37	02/15	340,807.30		

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1. Tell us your name, your business's name (if appropriate) and the Huntington account number (if any).
2. Describe the error or the transaction you are unsure about, and explain as clearly as you can why you believe there is an error or why you need more information.
3. Tell us the dollar amount of the suspected error. We will investigate your complaint or question and will correct any error promptly.

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Balancing Your Statement - For your convenience, a balancing page is available on our web site <https://www.huntington.com/pdf/balancing.pdf> and also available on Huntington Business Online.

Peterson Connors LLP

INVOICE

545 Metro Place South, Suite 435
 Dublin, OH 43017
 United States
 (614) 365-7000

Invoice # 7809
 Date: 03/21/2024

United States Southern District

Receiver / Root, et al. v. Silver, et al., 2:23cv512

Date	Notes	Timekeeper	Quantity	Rate	Total
01/02/2024	Review docket filings and sort and organize file.	Istvan Gajary	2.20	\$150.00	\$330.00
01/08/2024	Outlining/drafting sixth report.	Jerry E. Peer, Jr.	1.20	\$150.00	\$180.00
01/08/2024	Attention to emails with M Tine and J Lehigh re: offer to purchase Bayshore property.	Jerry E. Peer, Jr.	0.30	\$150.00	\$45.00
01/10/2024	Several phone calls re: offers to purchase property, closing, and pending foreclosure. Attention to emails re: same. Phone call with M Tine re: GC lien rights.	Jerry E. Peer, Jr.	2.70	\$150.00	\$405.00
01/11/2024	Attention to details related to the sale of Bayshore property.	Istvan Gajary	1.60	\$150.00	\$240.00
01/16/2024	Attention to emails from M Tine. Review of contract.	Jerry E. Peer, Jr.	0.80	\$150.00	\$120.00
01/17/2024	Attention to emails from J Secrest re: Florida foreclosure.	Jerry E. Peer, Jr.	0.40	\$150.00	\$60.00
01/19/2024	Phone call with M Tine re: timing for closing.	Jerry E. Peer, Jr.	0.20	\$150.00	\$30.00
01/22/2024	Calculating interest due under Bayshore note/ mortgage.	Jerry E. Peer, Jr.	0.60	\$150.00	\$90.00
01/23/2024	Attention to emails from counsel, M Tine and P Lopez re: net proceeds from sale and amounts due under the note. Phone call with B Kloss re: sale of Bayshore property.	Jerry E. Peer, Jr.	0.80	\$150.00	\$120.00
01/25/2024	Attention to emails re: DW invoice and 6th report.	Jerry E. Peer, Jr.	0.40	\$150.00	\$60.00
01/26/2024	Attention to status of pending matters and next steps.	Jerry E. Peer, Jr.	1.40	\$150.00	\$210.00

EXHIBIT B

01/29/2024	Attention to several emails re: closing of Bayshore, sale of Walnut, and other misc. matters	Jerry E. Peer, Jr.	0.80	\$150.00	\$120.00
01/29/2024	Attention to several emails re: closing of Bayshore sale.	Jerry E. Peer, Jr.	0.80	\$150.00	\$120.00
01/30/2024	Attention to emails re: closing of Bayshore sale. Attention to emails re: expenses related to Walnut property. Review of same. Following up re: auction of Walnut property.	Jerry E. Peer, Jr.	2.40	\$150.00	\$360.00
01/31/2024	Attention to emails re: closing of Bayshore. Phone call with R Kruse re: sale of Walnut.	Jerry E. Peer, Jr.	0.80	\$150.00	\$120.00
01/31/2024	Attention to invoices related to Walnut property.	Jerry E. Peer, Jr.	0.60	\$150.00	\$90.00
02/01/2024	Preparing for and attending status conf. Attention to emails re: sale of properties.	Jerry E. Peer, Jr.	0.70	\$150.00	\$105.00
02/02/2024	Attention to emails re: Miami 555 claim and breakdown.	Jerry E. Peer, Jr.	0.60	\$150.00	\$90.00
02/08/2024	Phone call with R Kruse re: sale of Walnut property.	Jerry E. Peer, Jr.	0.30	\$150.00	\$45.00
02/12/2024	Attention to several emails re: agreed order and closing.	Jerry E. Peer, Jr.	0.50	\$150.00	\$75.00
02/12/2024	Attention to Walnut auction materials.	Jerry E. Peer, Jr.	0.80	\$150.00	\$120.00
02/13/2024	Attention to emails from M Tine re: status of order to sell Bayshore. Phone call with counsel re: status conference.	Jerry E. Peer, Jr.	0.50	\$150.00	\$75.00
02/14/2024	Preparing for and attending status conference. Attention to emails re: upcoming Bayshore closing.	Jerry E. Peer, Jr.	2.50	\$150.00	\$375.00
02/14/2024	Attention to emails from R Kruse. Phone call with R Kruse re: auction. Attention to messages from T Hagerla re: cleanout and related matters.	Jerry E. Peer, Jr.	0.90	\$150.00	\$135.00
02/15/2024	Attention to emails re: Ramona closing and tax refund. Review of revised HUD.	Jerry E. Peer, Jr.	0.50	\$150.00	\$75.00
02/15/2024	Attention to emails from R Kruse re: Venice auction. Attention to auction agreement and related documents. Phone call with R Kruse re: auction.	Jerry E. Peer, Jr.	1.20	\$150.00	\$180.00
02/15/2024	Phone call with R Kruse re: auction terms and disclosures.	Jerry E. Peer, Jr.	0.40	\$150.00	\$60.00
02/15/2024	Review of Evolve bank records.	Jerry E. Peer, Jr.	1.50	\$150.00	\$225.00
02/15/2024	Draft chain of custody affidavit concerning Silver's iphones and laptop.	Gregory Peterson	1.00	\$150.00	\$150.00

Invoice # 7809 - 03/21/2024

02/19/2024	Review of response to Wise subpoena. Search for new parties identified in Wise records.	Jerry E. Peer, Jr.	2.60	\$150.00	\$390.00
02/29/2024	Following up with Florida counsel and buyer's counsel re: Kabco lien. Attention to next steps to remove lien.	Jerry E. Peer, Jr.	0.50	\$150.00	\$75.00
03/01/2024	Attention to several emails re: closing documents. Review of same.	Jerry E. Peer, Jr.	1.70	\$150.00	\$255.00
03/04/2024	Attention to emails from R Kruse re: offer to purchase and broker bidding while representing a bidder. Phone call re: same. Reviewing and revising email to broker.	Jerry E. Peer, Jr.	0.60	\$150.00	\$90.00
03/05/2024	Review of lien release. Review of final revised loan documents and signing same. Attention to follow up emails re: closing. Phone calls with J. Valdes re: closing documents, holdbacks and wire instructions.	Jerry E. Peer, Jr.	2.60	\$150.00	\$390.00
03/05/2024	Review of HUD. Email to closing agent re: payoff.	Jerry E. Peer, Jr.	0.70	\$150.00	\$105.00
03/06/2024	Attention to emails re: closing documents. Following up on status of closing. Review of final/ executed closing documents.	Jerry E. Peer, Jr.	0.80	\$150.00	\$120.00
03/12/2024	Attention to emails from P Glenn-Applegate. Attention to notice of hearing and order denying release.	Jerry E. Peer, Jr.	0.30	\$150.00	\$45.00
03/14/2024	Phone call with R Kruse re: sale of Walnut property.	Jerry E. Peer, Jr.	0.50	\$150.00	\$75.00
03/15/2024	Review of emails and sentencing memorandum.	Jerry E. Peer, Jr.	0.80	\$150.00	\$120.00
				Subtotal	\$6,075.00
				Total	\$6,075.00

Statement of Account

Outstanding Balance	New Charges	Amount in Trust	Payments Received	Total Amount Outstanding
(\$0.00	+ \$6,075.00) - (\$0.00	+ \$0.00) = \$6,075.00

Please make all amounts payable to: Peterson Connors LLP

Payment is due upon receipt.

Payments more than 30 days overdue incur 1.5% per month interest charges.

Please notify us if your contact information has changed.

Invoice # 7809 - 03/21/2024

Our Tax ID: 20-8129097

Peterson Connors LLP

INVOICE

545 Metro Place South, Suite 435
 Dublin, OH 43017
 United States
 (614) 365-7000

Invoice # 7808
 Date: 03/21/2024

United States Southern District

Attorney / Root, et al. v. Silver, et al., 2:23cv512

Services

Date	Notes	Timekeeper	Quantity	Rate	Total
01/02/2024	Telephone call to Michael Welborn of NewRez Servicing (Shellpoint) and discuss next steps. Travel to and from nearest Huntington National Bank location to initiate wire of funds to NewRez as down payment on the future Walnut Ave. payoff; give confirmation notification to receiver. Reconcile December 2023 HNB statement and transmit with check register to receiver and counsel.	Catherine Schwartz	1.90	\$125.00	\$237.50
01/04/2024	Sort and organize file; review docket entries; prepare Sixth Interim Report.	Istvan Gajary	3.70	\$250.00	\$925.00
01/05/2024	Attention to order granting motion for relief. Attention to emails re: same. Research re: final appealable order.	Jerry E. Peer, Jr.	1.40	\$250.00	\$350.00
01/05/2024	Review Order [ECF 215] on motion of Miami 555 to lift litigation stay; attention to related emails.	Istvan Gajary	2.50	\$250.00	\$625.00
01/08/2024	Research re: final appealable order. Emails to Florida counsel re: timing of foreclosure. Revising Motion to Sell Walnut at public sale.	Jerry E. Peer, Jr.	1.90	\$250.00	\$475.00
01/08/2024	Prepare and draft motion to hire auctioneer/ realtor to sell Walnut property; telephone call with realtor to discuss same; attention to numerous details related to sale of Bayshore property; review court docket and review decision [ECF 216] on motion to dismiss;	Istvan Gajary	5.80	\$250.00	\$1,450.00

EXHIBIT C

	attention to related emails; discuss expenses with realtor.				
01/09/2024	Review of Court's Entry granting and denying motion to dismiss. Attention to Walnut auction agreement.	Jerry E. Peer, Jr.	1.20	\$250.00	\$300.00
01/09/2024	Revise, finish, and file motion to emply auctioneer to sell Walnut property; attention to numerous telephone calls and emails related to offer at Bayshore property and update with Kabco Kitchens on renovations and possibly purchase options; review current indebtedness of Bayshore property; review Court docket.	Istvan Gajary	4.20	\$250.00	\$1,050.00
01/10/2024	Process payment to Tyler Hagala for services with vehicle, transportation, and properties. Submit claims to Citizens Insurance for unclaimed premium refund/replacement checks under Eclipse Home Design LLC. Attention to various communications about offers at Bayshore.	Catherine Schwartz	0.90	\$125.00	\$112.50
01/10/2024	Phone calls and emails re: purchase offers and foreclosure. Drafting motion to sell Bayshore property. Drafting motion to abandon personal property located at Bayshore property. Attention to contractor lien rights in Florida.	Jerry E. Peer, Jr.	2.70	\$250.00	\$675.00
01/10/2024	Review offer for Bayshore property; telephone call with Carlos about contractor work and possibly purchase options; prepare Sixth Interim Report.	Istvan Gajary	1.80	\$250.00	\$450.00
01/12/2024	Review and revise purchase contract for Bayshore property; attention to numerous related texts and emails; continued preparation of Sixth Interim Report.	Istvan Gajary	2.80	\$250.00	\$700.00
01/16/2024	Drafting motion to sell Bayshore property.	Jerry E. Peer, Jr.	0.70	\$250.00	\$175.00
01/16/2024	Attention to emails with Florida local counsel about Miami 555's efforts to meove forward with forclosure; attention to other receivership matters.	Istvan Gajary	1.20	\$250.00	\$300.00
01/17/2024	Drafting motion to sell Bayshore.	Jerry E. Peer, Jr.	2.20	\$250.00	\$550.00
01/18/2024	Drafting/revising motion to sell. Attention to addendum to purchase agreement. Research re: recovering attorney fees related to stay.	Jerry E. Peer, Jr.	2.50	\$250.00	\$625.00
01/18/2024	Review and revise motiонт o sell Bayshore property; attention to emails and review purchase contract.	Istvan Gajary	1.60	\$250.00	\$400.00

01/19/2024	Assist with sixth interim report preparation. Attention to multiple emails re sixth interim report, motion to sell Bayshore, and expedited briefing.	Catherine Schwartz	0.50	\$125.00	\$62.50
01/19/2024	Revise, finish, and file motion to sell Bayshore property; attention to related emails; discuss Receivership with counsel for Defendant, Silver; review file and located items requested; attention to related texts and review for Sixth Interim Report; attention to emails and docket entries and briefing schedule.	Istvan Gajary	2.80	\$250.00	\$700.00
01/19/2024	Drafting order granting sale of Bayshore. Attention to Notation order re: expedited briefing. Attention to emails from counsel.	Jerry E. Peer, Jr.	0.80	\$250.00	\$200.00
01/19/2024	Attention to multiple emails re: Bayshore property and other matters.	Jerry E. Peer, Jr.	0.60	\$250.00	\$150.00
01/22/2024	Attention to emails from Miami 555 counsel. Review of previous affidavits re: balance due. Revising order to sell.	Jerry E. Peer, Jr.	1.10	\$250.00	\$275.00
01/22/2024	Further assistance with the sixth interim report.	Catherine Schwartz	0.30	\$125.00	\$37.50
01/22/2024	Review of mortgage terms in comparison to payoff from Miami 555.	Jerry E. Peer, Jr.	1.30	\$250.00	\$325.00
01/22/2024	Review note and mortgage to Bayshore property and evaluate claims raised by counsel for Miami 555; attention to numerous emails; review file and forward docs to counsel for defendant.	Istvan Gajary	2.60	\$250.00	\$650.00
01/22/2024	Attention to several emails re: Miami 555 payoff. Comparing same to prior payoff breakdown.	Jerry E. Peer, Jr.	1.50	\$250.00	\$375.00
01/23/2024	Attention to emails from B Kopelowitz re: motion to sell.	Jerry E. Peer, Jr.	0.70	\$250.00	\$175.00
01/23/2024	Drafting/revising order granting motion to sell Bayshore.	Jerry E. Peer, Jr.	2.30	\$250.00	\$575.00
01/23/2024	Attention to emails, continued sixth interim report preparation, and Order approving sale of Bayshore.	Catherine Schwartz	0.80	\$125.00	\$100.00
01/23/2024	Revise and circulate draft version of Sixth Interim Report for review; attention to numerous emails with counsel for Miami 555 about objection to sale of Bayshore property; review and revise proposed order of sale.	Istvan Gajary	2.30	\$250.00	\$575.00
01/23/2024	Attention to numerous emails with B	Jerry E. Peer, Jr.	1.50	\$250.00	\$375.00

Kopelowitz re: sale of Bayshore property.					
01/25/2024	Drafting/revising 6th interim report. Drafting motion to abandon personal property at Bayshore.	Jerry E. Peer, Jr.	3.30	\$250.00	\$825.00
01/25/2024	Attention to emails, continued sixth interim report preparation.	Catherine Schwartz	0.70	\$125.00	\$87.50
01/25/2024	Attention to emails from B Kopelowitz re: motion to sell. Review of HUD and title work. Review of Miami 555 summary judgment motion and exhibits. Providing same to B Kopelowitz. Email to P Lopez re: Champions Funding on HUD	Jerry E. Peer, Jr.	0.70	\$250.00	\$175.00
01/25/2024	Attention to emails.	Istvan Gajary	0.30	\$250.00	\$75.00
01/26/2024	Reviewing/revising motion to abandon personal property at Bayshore.	Jerry E. Peer, Jr.	0.60	\$250.00	\$150.00
01/26/2024	Obtain and review ECF 231, Miami 555's objection to motion to sell Bayshore property; consideration of alternative responses and resolution; review order of distribution of sale proceeds.	Istvan Gajary	1.00	\$250.00	\$250.00
01/26/2024	Review of HUD. Review of Bayshore foreclosure filings and emails re: Miami 555 holding mortgage. Emails to title agent re: same.	Jerry E. Peer, Jr.	1.10	\$250.00	\$275.00
01/29/2024	Attention to objection filed by Miami 555 to motion to sell Bayshore. Review of cases cited. Email to court re: status conf. Attention to emails with Miami 555 counsel re: resolution.	Jerry E. Peer, Jr.	2.60	\$250.00	\$650.00
01/29/2024	Assist with finalizing the Sixth interim report. Attention to Huntington bank records. Emails about the objection and docket notation orders.	Catherine Schwartz	0.70	\$125.00	\$87.50
01/29/2024	Attention to numerous emails and revision of proposed order for the sale of Bayshore property; negotiations with attorney for Miami 555 about objection to motion to sell; attention to related closing details and locate documents needed for closing; revise, finish, and file Sixth Interim Report; telephone call and follow-up with Tyler and Rich on Walnut property sale.	Istvan Gajary	4.80	\$250.00	\$1,200.00
01/30/2024	Attention to emails about security and internet from November 2023 to February 2024 with Mr. Tyler Hagerla. Intake of policy premium refund documents from Citizens Property	Catherine Schwartz	0.50	\$125.00	\$62.50

Insurance.					
01/30/2024	Attention to details related to expenses at Walnut property; review and revise proposed order.	Istvan Gajary	0.40	\$250.00	\$100.00
01/30/2024	Attention to emails re: Bayshore closing, insurance proceeds and other matters.	Jerry E. Peer, Jr.	0.50	\$250.00	\$125.00
01/31/2024	Preparing for status conference. Attention to emails re: summary judgment in Florida case. Review of fees allegedly incurred by Miami 555.	Jerry E. Peer, Jr.	0.80	\$250.00	\$200.00
01/31/2024	Multiple team emails in preparation for tomorrow's status conference, Tyler Hagerla emails for Walnut Avenue pool expenses, and regarding motion to abandon the property at Bayshore; process insurance premium refund deposit and subsequent attention to Huntington online banking; Intake of a second policy premium refund from Citizens Property Insurance.	Catherine Schwartz	0.90	\$125.00	\$112.50
01/31/2024	Continued negotiations with attorney for Miami 555 Brian K. on language of proposed order of sale of Bayshore property; attention to related emails; review timeline for foreclosure sale under Florida law; continued review of same.	Istvan Gajary	2.60	\$250.00	\$650.00
02/01/2024	Process second insurance premium refund. Reconcile the January 2024 Huntington National Bank statement.	Catherine Schwartz	0.70	\$125.00	\$87.50
02/01/2024	Review of revised order to sell Bayshore property.	Jerry E. Peer, Jr.	0.20	\$250.00	\$50.00
02/01/2024	Review of revised order to sell and emails related thereto.	Jerry E. Peer, Jr.	0.30	\$250.00	\$75.00
02/01/2024	Attention to emails related to sale of Mercedes; review court docket; prepare for and attend status conference; review revisions to proposed order by Miami 555; telephone call with Brian K. attorney for Miami 555 to discuss same; further revisions to proposed order of sale of Bayshore property and email with Brian K.; attention to details related to sale of Walnut property.	Istvan Gajary	2.80	\$250.00	\$700.00
02/02/2024	Attention to email from J Secrest. Review of final judgment in foreclosure action.	Jerry E. Peer, Jr.	0.20	\$250.00	\$50.00
02/05/2024	Review of Plea Agreement and comparing same to notes and assets shared by B Silver.	Jerry E. Peer, Jr.	1.60	\$250.00	\$400.00
02/05/2024	Attention to details about transfer of title of	Istvan Gajary	0.80	\$250.00	\$200.00

	Mercedes; prepare proposed order; attention to emails.				
02/06/2024	Attention to emails with Miami 555 counsel re: agreed order and payoff.	Jerry E. Peer, Jr.	0.30	\$250.00	\$75.00
02/06/2024	Follow up emails with attorney Brian K. about proposed order language and payoff.	Istvan Gajary	0.40	\$250.00	\$100.00
02/08/2024	Attention to emails from Miami 555 counsel.	Jerry E. Peer, Jr.	0.20	\$250.00	\$50.00
02/08/2024	Review 6th interim report; bring the Dickinson Wright invoice to counsel and receiver's attention.	Catherine Schwartz	0.30	\$125.00	\$37.50
02/08/2024	Attention to emails with Brian K. (atty for Miami 555) about Bayshore payoff; review claim for legal fees.	Istvan Gajary	0.90	\$250.00	\$225.00
02/09/2024	Review of Miami 555 payoff in relation to prior payoff(s). Attention to emails from Miami 555 counsel re: payoff and order to sell property. Attention to emails from court and B Kloss re: same. Attention to and revising motion to abandon personal property at Bayshore.	Jerry E. Peer, Jr.	1.40	\$250.00	\$350.00
02/09/2024	Attention to numerous emails with various people about Bayshore sale; emails with Court; revise, finish, and file motion to abandon personal property at Bayshore property; prepare for next week's hearing.	Istvan Gajary	1.80	\$250.00	\$450.00
02/13/2024	Preparing for status conference. Phone call with J Epstein re: assets of receivership estate.	Jerry E. Peer, Jr.	1.50	\$250.00	\$375.00
02/13/2024	Telephone call with GSP and JEP to discuss receivership tasks and progress in advance of status conference; telephone call with Joshua Epstein to discuss receivership assets; locate and forward docs to same.	Istvan Gajary	2.70	\$250.00	\$675.00
02/14/2024	Attention to multiple emails re today's status conference and Walnut auction; process wire of funds to R Kruse to cover approved expense amount.	Catherine Schwartz	0.90	\$125.00	\$112.50
02/14/2024	Research re: obtaining information from Jakarta bank. Following up on Evolve subpoena. Attention to numerous emails re: foreclosure action.	Jerry E. Peer, Jr.	1.60	\$250.00	\$400.00
02/14/2024	Numerous emails with JEP and KS about wire transfers related to Walnut property; travel to and from courthouse for status conference; attention to emails related to Bayshore closing.	Istvan Gajary	2.50	\$250.00	\$625.00

02/15/2024	Emails for processing the receipt of 1st half tax refund for Ramona property; Assist with Peterson affidavit about chain of materials custody; attention to Evolve bank materials.	Catherine Schwartz	0.60	\$125.00	\$75.00
02/15/2024	Review of court's orders re: status conference. Attention to emails re: pending cases and closing.	Jerry E. Peer, Jr.	0.70	\$250.00	\$175.00
02/15/2024	Attention to numerous emails related to closing details at Bayshore property; telephone call with Tyler H. about listing details for Walnut property; review Evolve Bank records.	Istvan Gajary	1.80	\$250.00	\$450.00
02/20/2024	Attention to emails re: under writer requirements for closing. Review of documents from Miami 555 required for closing.	Jerry E. Peer, Jr.	1.00	\$250.00	\$250.00
02/21/2024	Attention to email from P Lopez re: underwriter's questions/requests.	Jerry E. Peer, Jr.	0.70	\$250.00	\$175.00
02/21/2024	Attention to DW invoice and 6th interim report; Walnut auction listing; emails and online Huntington bank information.	Catherine Schwartz	0.40	\$125.00	\$50.00
02/22/2024	Attention to numerous emails related to closing at Bayshore property.	Istvan Gajary	1.00	\$250.00	\$250.00
02/23/2024	Attention to email from title agent re: requirements for closing. Review of federal and Florida statutes re: appointment of receiver and authority.	Jerry E. Peer, Jr.	0.80	\$250.00	\$200.00
02/23/2024	Attention to numerous emails related to closing at Bayshore property.	Istvan Gajary	0.50	\$250.00	\$125.00
02/26/2024	Attention to multiple emails re: requirements in title commitment. Review of title commitment and other closing documents.	Jerry E. Peer, Jr.	2.80	\$250.00	\$700.00
02/26/2024	Attention to numerous emails with various people about Bayshore closing.	Istvan Gajary	0.50	\$250.00	\$125.00
02/27/2024	Attention to emails re: closing requirements. Review of forfeiture case docket. Email to USDA office re: release. Multiple phone calls regarding documents needed for closing. Drafting DOJ Release. Review of Eclipse/Silver waiver/consent. Review of Kabco lien and prior communications re: invoices and future work to determine last date Kabco was on site. Phone calls with Buyer's counsel and bond company re: Kabco lien. Attention to emails from Florida counsel.	Jerry E. Peer, Jr.	5.30	\$250.00	\$1,325.00
02/28/2024	Review of emails re: Kabco lien and other	Jerry E. Peer, Jr.	5.60	\$250.00	\$1,400.00

	closing needs. Emails to Miami 555 counsel re: extension to closing. Phone call with buyer's counsel re: extension and lien. Email to G Peterson and Root counsel re: update. Numerous phone calls re: closing and related matters. Attention to several emails re: same. Attention to letter to Kabco re: lien. Attention to notice from buyer of extending closing date.				
02/28/2024	Emails with J Peer and T Hagerla regarding Kelly Carlshe's Walnut Avenue debris removal and cleanout services; update Huntington National Banking data to the receivership checking register.	Catherine Schwartz	0.30	\$125.00	\$37.50
02/29/2024	Attention to several emails re: documents needed for closing.	Jerry E. Peer, Jr.	0.70	\$250.00	\$175.00
03/04/2024	Attention to email from B Kopelowitz. Review of emails re: lien release. Attention to filings required for closing. Review of closing docs. Phone call with B Kopelowitz re: closing.	Jerry E. Peer, Jr.	1.70	\$250.00	\$425.00
03/05/2024	Attention to several emails from buyer's counsel and Kabco counsel re: release of lien. Review of lien release and final revised loan documents.	Jerry E. Peer, Jr.	2.30	\$250.00	\$575.00
03/05/2024	Emails and calls with Attorney Jerry Peer; obtain certified copies of three documents from the U.S. District Court Clerk's office [23-cv-512 #239, #249 23-cr-201 #56]; meeting with Atty. Peer for execution of various 9125 N Bayshore Drive closing documents; transmit electronic scans of all to Mr. Pablo Lopez and Ms. Joanna Valdez; ship the same by FedEx.	Catherine Schwartz	2.90	\$125.00	\$362.50
03/06/2024	Drafting 7th report.	Jerry E. Peer, Jr.	1.20	\$250.00	\$300.00
03/06/2024	Attention to Walnut Avenue expenses, the closing on North Bayshore, reconciliation of the February 2024 statement from Huntington National Bank, and emails related to all. Assist with preparation of the 7th interim report.	Catherine Schwartz	0.70	\$125.00	\$87.50
03/06/2024	Confirming wire to Miami 555. Review of Miami 555's motion to cancel the sale, dismiss the complaint, and discharge the lis pendens.	Jerry E. Peer, Jr.	0.30	\$250.00	\$75.00
03/11/2024	Attention to and drafting 7th report. Attention to emails from J Secrest re: Florida foreclosure.	Jerry E. Peer, Jr.	0.80	\$250.00	\$200.00

Invoice # 7808 - 03/21/2024

Services Subtotal \$31,575.00**Expenses**

Date	Notes	Quantity	Rate	Total
03/05/2024	Payment to Park Mobile for paralegal parking expense at Columbus, Ohio Zone #5923 near District Court	1.00	\$4.35	\$4.35
03/05/2024	Payment to U.S. District Court for electronic printing and certification of document fees	1.00	\$37.40	\$37.40
Expenses Subtotal				\$41.75
Subtotal				\$31,616.75
Total				\$31,616.75

Statement of Account

Outstanding Balance	New Charges	Amount in Trust	Payments Received	Total Amount Outstanding
(\$0.00	+ \$31,616.75) - (\$0.00	+ \$0.00) = \$31,616.75

Please make all amounts payable to: Peterson Connors LLP

Payment is due upon receipt.

Payments more than 30 days overdue incur 1.5% per month interest charges.

Please notify us if your contact information has changed.

Our Tax ID: 20-8129097

IN ACCOUNT WITH



1801 E. BROAD STREET, SUITE 8400
COLUMBUS, OH 43215
TELEPHONE: (614) 744-2570
<http://www.dickinsonwright.com>
FEDERAL I.D. #38-1364333

INVOICE DATE: JANUARY 9, 2024
INVOICE NO.: 1882161

JERRY E PEER JR.
TWO MIRANOVA PLACE, SUITE 330
COLUMBUS, OH 43215

ATTN: Jerry E. Peer, Jr.

CLIENT/MATTER NO.: 106102-00001

RE: COUNSEL FOR RECEIVER - ROOT, INC., ET AL. V. SILVER ET AL.

PRIVILEGED AND CONFIDENTIAL

FOR PROFESSIONAL SERVICES THROUGH DECEMBER 31, 2023

USD

TOTAL FEES CURRENT INVOICE	\$	6,565.50
TOTAL DISBURSEMENTS CURRENT INVOICE	\$	250.00
TOTAL CURRENT INVOICE	\$	6,815.50

OUTSTANDING INVOICES ON THE MATTER BILLED ON THIS CURRENT INVOICE AS OF JANUARY 9, 2024

<u>INVOICE</u>	<u>DATE</u>	<u>BILLED VALUE</u>	<u>PAYMENTS</u>	<u>OUTSTANDING</u>
1852826	10/09/23	9,458.00	(0.00)	9,458.00
1862856	11/08/23	904.00	(0.00)	904.00
1870710	12/05/23	4,778.50	(0.00)	4,778.50

TOTAL OUTSTANDING FROM PRIOR INVOICES	\$	15,140.50
TOTAL AMOUNT DUE	\$	21,956.00

Remittance Instructions				
Terms: Due and Payable Upon Receipt				
Mail To:	Pay Online:	Wire Instructions:	ACH Instructions:	
Dickinson Wright PLLC 2600 W. Big Beaver Suite 300 Troy, MI 48084	Credit Card and ACH/eCheck Payments We accept Visa®, Mastercard®, American Express® and Discover® https://www.dickinson-wright.com/invoice-payment	JP Morgan Chase Bank N.A. 28660 Northwestern Highway Southfield, MI 48034 ABA Number: 021 000 021 Swift Code: CHASUS33 (International) Account# 38852	JP Morgan Chase Bank N.A. 28660 Northwestern Highway Southfield, MI 48034 ABA Number: 072 000 326 Account# 38852	

(Please reference your client/invoice numbers when paying electronically)

EXHIBIT D

IN ACCOUNT WITH



1800 E. BROAD STREET, SUITE 8400
COLUMBUS, OH 43215
TELEPHONE: (614) 744-2570
<http://www.dickinsonwright.com>
FEDERAL I.D. #38-1364333

COUNSEL FOR RECEIVER - ROOT, INC., ET AL. V. SILVER ET AL.
CLIENT/MATTER NO.: 106102-00001

INVOICE DATE: JANUARY 9, 2024
INVOICE NO.: 1882161
PAGE 2

CURRENT INVOICE DETAIL

<u>DATE</u>	<u>INITIALS</u>	<u>SERVICES</u>	<u>HOURS</u>	<u>VALUE</u>
12/01/23	JRS	Review research for response to writ.	0.9	508.50
12/07/23	JRS	Exchange emails with client and opposing counsel regarding settlement.	0.2	113.00
12/07/23	JRS	Receipt and review of order granting extension to file opposition to petition for writ.	0.2	113.00
12/20/23	JRS	Review federal court briefing on motion to lift injunction.	0.4	226.00
12/22/23	JRS	Review case law for Opposition to Petition.	0.6	339.00
12/26/23	JRS	Draft Opposition to Petition for Writ.	7.2	4,068.00
12/26/23	JMS	Review of the Third DCA's Appellate Record to extract the petition and appendix.	0.2	71.00
12/27/23	HV	Review and analyze selected Florida and Federal case law cited in the Response to the Petition for Writ on behalf of Jerry Peer in connection with finalizing the same.	0.8	424.00
12/27/23	HV	Review and analyze the Receiver's Response to the Miami 555 Petition for Writ with the 3rd DCA.	0.9	477.00
12/27/23	JRS	Revise and finalize Response to Petition and Appendix.	0.4	226.00
TOTAL FEES			11.8	\$ 6,565.50

DISBURSEMENTS

Transcript

VALUE

250.00

TOTAL DISBURSEMENTS \$ 250.00

TOTAL CURRENT INVOICE \$ 6,815.50

TIMEKEEPER SUMMARY

<u>TIMEKEEPER</u>	<u>TITLE</u>	<u>RATE</u>	<u>HOURS</u>	<u>VALUE</u>
JONATHAN R. SECREST	MEMBER	565.00	9.90	5,593.50
H. STEVEN VOGEL	MEMBER	530.00	1.70	901.00
JOHNEEKA M. SIMPSON	ASSOCIATE	355.00	0.20	71.00
TOTAL FEES CURRENT INVOICE			11.80	\$ 6,565.50

IN ACCOUNT WITH



1800 E. BIG BEAVER STREET, SUITE 3400
COLUMBUS, OH 43215
TELEPHONE: (614) 744-2570
<http://www.dickinsonwright.com>
FEDERAL I.D. #38-1364333

INVOICE DATE: MARCH 7, 2024
INVOICE NO.: 1900370

JERRY E. PEER, JR.
PETERSON CONNERS LLP
545 METRO PLACE SOUTH, SUITE 435
DUBLIN, OH 43017

ATTN: Jerry E. Peer, Jr.

CLIENT/MATTER NO.: 106102-00001

RE: COUNSEL FOR RECEIVER - ROOT, INC., ET AL. V. SILVER ET AL.

PRIVILEGED AND CONFIDENTIAL

FOR PROFESSIONAL SERVICES THROUGH FEBRUARY 29, 2024

USD

TOTAL FEES CURRENT INVOICE \$ 3,906.00

TOTAL CURRENT INVOICE \$ 3,906.00

OUTSTANDING INVOICES ON THE MATTER BILLED ON THIS CURRENT INVOICE AS OF MARCH 7, 2024

<u>INVOICE</u>	<u>DATE</u>	<u>BILLED VALUE</u>	<u>PAYMENTS</u>	<u>OUTSTANDING</u>
1882161	01/09/24	6,815.50	(0.00)	6,815.50
1889513	02/05/24	4,318.00	(0.00)	4,318.00

TOTAL OUTSTANDING FROM PRIOR INVOICES \$ 11,133.50

TOTAL AMOUNT DUE \$ 15,039.50

Remittance Instructions			
Terms: Due and Payable Upon Receipt			
Mail To:	Pay Online:	Wire Instructions:	ACH Instructions:
Dickinson Wright PLLC 2600 W. Big Beaver Suite 300 Troy, MI 48084	Credit Card and ACH/eCheck Payments We accept Visa®, Mastercard®, American Express® and Discover® https://www.dickinson-wright.com/invoice-payment	JP Morgan Chase Bank N.A. 28660 Northwestern Highway Southfield, MI 48034 ABA Number: 021 000 021 Swift Code: CHASUS33 (International) Account# 38852	JP Morgan Chase Bank N.A. 28660 Northwestern Highway Southfield, MI 48034 ABA Number: 072 000 326 Account# 38852

(Please reference your client/invoice numbers when paying electronically)

IN ACCOUNT WITH



180 E. BROAD STREET, SUITE 8400
 COLUMBUS, OH 43215
 TELEPHONE: (614) 744-2570
<http://www.dickinsonwright.com>
 FEDERAL I.D. #38-1364333

COUNSEL FOR RECEIVER - ROOT, INC., ET AL. V. SILVER ET AL.
 CLIENT/MATTER NO.: 106102-00001

INVOICE DATE: MARCH 7, 2024
 INVOICE NO.: 1900370
 PAGE 2

CURRENT INVOICE DETAIL

<u>DATE</u>	<u>INITIALS</u>	<u>SERVICES</u>	<u>HOURS</u>	<u>VALUE</u>
02/02/24	JRS	Review judgment entry and supplemental affidavit and draft client update.	0.3	181.50
02/27/24	AER	Reviewed emails from client including attached CoL; Attended call w/client Re strategy; Reviewed supplemental emails from client Re lienor's efforts; Reviewed Ch. 713, Fla. Stat.; Prepared response to client; Finalized demand letter to lienor; Further revisions to demand; Exchanged emails w/JS Re same.	2.7	1,741.50
02/27/24	JAH	Finalize and email/FedEx demand letter.	0.5	105.00
02/27/24	HV	Review and analyze the Claim of Lien filed against Eclipse Home Design Inc and attend conference call with all counsel regarding the same and strategy for further handling.	0.5	285.00
02/27/24	JRS	Conference with Jerry regarding lien and draft portion of demand letter regarding show cause.	0.8	484.00
02/27/24	JRS	Research issue of lien record post-foreclosure judgment.	1.1	665.50
02/28/24	AER	Exchanged emails w/client Re status; Call w/JH Re status; Reviewed transmissions.	0.3	193.50
02/29/24	AER	Exchanged emails w/client Re status; Prepared email to counsel Re same.	0.2	129.00
02/29/24	JRS	Receipt and review of motion to amend final judgment.	0.2	121.00
TOTAL FEES			6.6	\$ 3,906.00
TOTAL CURRENT INVOICE				\$ <u>3,906.00</u>

TIMEKEEPER SUMMARY

<u>TIMEKEEPER</u>	<u>TITLE</u>	<u>RATE</u>	<u>HOURS</u>	<u>VALUE</u>
ADAM E RICHARDS	MEMBER	645.00	3.20	2,064.00
JONATHAN R. SECREST	MEMBER	605.00	2.40	1,452.00
H. STEVEN VOGEL	MEMBER	570.00	0.50	285.00
JUDITH A HUNT	ASSISTANT	210.00	0.50	105.00
TOTAL FEES CURRENT INVOICE			6.60	\$ <u>3,906.00</u>



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TELEPHONE: (614) 744-2570
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FEDERAL I.D. #38-1364333

INVOICE DATE: FEBRUARY 5, 2024
INVOICE NO.: 1889513

JERRY E. PEER, JR.
PETERSON CONNERS LLP
545 METRO PLACE SOUTH, SUITE 435
DUBLIN, OH 43017

ATTN: Jerry E. Peer, Jr.

CLIENT/MATTER NO.: 106102-00001

RE: COUNSEL FOR RECEIVER - ROOT, INC., ET AL. V. SILVER ET AL.

PRIVILEGED AND CONFIDENTIAL

FOR PROFESSIONAL SERVICES THROUGH JANUARY 31, 2024

USD

TOTAL FEES CURRENT INVOICE \$ 4,318.00

TOTAL CURRENT INVOICE \$ 4,318.00

OUTSTANDING INVOICES ON THE MATTER BILLED ON THIS CURRENT INVOICE AS OF FEBRUARY 5, 2024

<u>INVOICE</u>	<u>DATE</u>	<u>BILLED VALUE</u>	<u>PAYMENTS</u>	<u>OUTSTANDING</u>
1882161	01/09/24	6,815.50	(0.00)	6,815.50

TOTAL OUTSTANDING FROM PRIOR INVOICES \$ 6,815.50

TOTAL AMOUNT DUE \$ 11,133.50

Remittance Instructions			
Terms: Due and Payable Upon Receipt			
Mail To:	Pay Online:	Wire Instructions:	ACH Instructions:
Dickinson Wright PLLC 2600 W. Big Beaver Suite 300 Troy, MI 48084	Credit Card and ACH/eCheck Payments We accept Visa®, Mastercard®, American Express® and Discover® https://www.dickinson-wright.com/invoice-payment	JP Morgan Chase Bank N.A. 28660 Northwestern Highway Southfield, MI 48034 ABA Number: 021 000 021 Swift Code: CHASUS33 (International) Account# 38852	JP Morgan Chase Bank N.A. 28660 Northwestern Highway Southfield, MI 48034 ABA Number: 072 000 326 Account# 38852
(Please reference your client/invoice numbers when paying electronically)			

IN ACCOUNT WITH



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FEDERAL I.D. #38-1364333

COUNSEL FOR RECEIVER - ROOT, INC., ET AL. V. SILVER ET AL.
CLIENT/MATTER NO.: 106102-00001

INVOICE DATE: FEBRUARY 5, 2024
INVOICE NO.: 1889513
PAGE 2

CURRENT INVOICE DETAIL

<u>DATE</u>	<u>INITIALS</u>	<u>SERVICES</u>	<u>HOURS</u>	<u>VALUE</u>
01/03/24	HV	Review and analyze the Miami 555 Appellants Reply Brief in Further Support of its Writ for Extraordinary Relief and compare the same to the Initial Brief to determine new arguments.	1.0	570.00
01/05/24	JRS	Receipt and review of order lifting injunction.	0.2	121.00
01/08/24	HV	Receipt and review correspondence from the Receiver regarding this case and discuss the foreclosure process in Miami-Dade County in order to determine next steps and further handling.	0.2	114.00
01/10/24	JRS	Receipt and review of notice of hearing and exchange emails with client regarding the same.	0.2	121.00
01/10/24	JMS	Perform research to determine the timeline of auction sales in Miami-Dade County, Florida.	0.8	304.00
01/16/24	JRS	Receipt and review of affidavits and draft client update.	0.2	121.00
01/17/24	JRS	Receipt and review of notice of lien.	0.2	121.00
01/17/24	JRS	Review case law regarding attorneys' fees and draft client update.	0.7	423.50
01/17/24	AER	Reviewed email from JS including attachment thereto, annotating same; Prepared response Re NTO and Ch. 713, Fl. St.	0.5	322.50
01/30/24	JRS	Review federal court filings to prepare for state court hearing.	0.4	242.00
01/30/24	JRS	Review case law to prepare for hearing on motion for summary judgment.	0.5	302.50
01/31/24	JRS	Prepare for and attend hearing on motion for summary judgment.	2.1	1,270.50
01/31/24	HV	Appear for and attend the hearing on the Plaintiff's motion for default and summary judgment.	0.5	285.00
TOTAL FEES			7.5	\$ 4,318.00
TOTAL CURRENT INVOICE				\$ <u>4,318.00</u>

IN ACCOUNT WITH



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COUNSEL FOR RECEIVER - ROOT, INC., ET AL. V. SILVER ET AL.
CLIENT/MATTER NO.:106102-00001

INVOICE DATE: FEBRUARY 5, 2024
INVOICE NO.: 1889513
PAGE 3

TIMEKEEPER SUMMARY				
<u>TIMEKEEPER</u>	<u>TITLE</u>	<u>RATE</u>	<u>HOURS</u>	<u>VALUE</u>
ADAM E RICHARDS	MEMBER	645.00	0.50	322.50
JONATHAN R. SECREST	MEMBER	605.00	4.50	2,722.50
H. STEVEN VOGEL	MEMBER	570.00	1.70	969.00
JOHNEEKA M. SIMPSON	ASSOCIATE	380.00	0.80	304.00
TOTAL FEES CURRENT INVOICE			7.50	\$ 4,318.00